

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE WESTERN DISTRICT OF OKLAHOMA**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	
	)	<b>Case No. CR-11-109-M</b>
<b>FARIDEH HEIDARPOUR,</b>	)	
<b>a/k/a Faraday Heidarpour,</b>	)	
<b>a/k/a Faraday Pour;</b>	)	
<b>ALI HEIDARPOUR; and</b>	)	
<b>A.B.C. BILLING, INC.,</b>	)	
	)	
<b>Defendants.</b>	)	

**MOTION TO DISMISS CHARGES AGAINST DEFENDANT,**  
**ALI HEIDARPOUR**

Plaintiff, United States of America, by Sanford C. Coats, United States Attorney for the Western District of Oklahoma, and Vicki Zemp Behenna and Kerry A. Kelly, Assistant United States Attorneys, pursuant to Rule 48(a), Federal Rules of Criminal Procedure moves this Court to dismiss without prejudice the above-styled case as to the defendant, **ALI HEIDARPOUR**, for the reason that such action would best meet the ends of justice.

WHEREFORE, plaintiff prays the Court to enter an Order dismissing without prejudice Count 1 of the Superseding Indictment returned herein on May 1, 2012, as to the defendant, **ALI HEIDARPOUR**.

Respectfully submitted,

SANFORD C. COATS  
United States Attorney

**s/VICKI ZEMP BEHENNA**

Assistant U.S. Attorney

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### **CERTIFICATE OF SERVICE**

I hereby certify that on September 14, 2012, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants: Drew Neville, Kevin E. Krahle and John Gile.

**s/VICKI ZEMP BEHENNA**

Assistant U.S. Attorney